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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

FELIX ESPINOZA-QUIROZ,

Petitioner,

v.

BRAD CAIN,

Respondent.

Case No. 2:18-cv-00467-HZ

MOTION TO FILE RESPONDENT'S
EXHIBIT 132 UNDER SEAL

Pursuant to Local Rule 3-7, respondent moves the Court for an order permitting respondent to file Exhibit 132 under seal. Respondent's Exhibit 132 is a CARES Evaluation of the minor victim, which is considered confidential under state law. ORS 418.795. The evaluation was submitted (under seal) by the petitioner in the underlying state post-conviction proceedings, *Espinoza-Quiroz v. Mark Nooth*, Malheur County Circuit Court Case No. 1310537P.

Pursuant to Local Rule 7-1(a)(1)(C), I did not confer with petitioner, a *pro se* inmate, about this motion.

DATED December 3, 2018.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Nick M. Kallstrom
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Of Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify that on December 3, 2018, I served the foregoing MOTION TO FILE
RESPONDENT'S EXHIBIT 132 UNDER SEAL upon the parties hereto by the method indicated
below, and addressed to the following:

Felix Espinoza-Quiroz
SID #18447509
Snake River Correctional Institution
777 Stanton Blvd.
Ontario, OR 97914-0595

☐ HAND DELIVERY
☐ MAIL DELIVERY
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)
☐ E-MAIL
☒ **E-SERVED PURSUANT TO
STANDING ORDER NO. 2017-9**

s/ Nick M. Kallstrom
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